

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS LIABILITY
LITIGATION

THIS DOCUMENT RELATES TO:

All Suits Against the Saint Thomas Entities

MDL No. 2419
Dkt. No 1:13-md-2419 (RWZ)

SAINT THOMAS ENTITIES' NOTICE OF FILING OF DEPOSITION NOTICES

Defendants the Saint Thomas Entities¹ give notice to the Court and to all parties that it has issued deposition notices to the following:

1. Victory Heating & Air Conditioning Co., Inc. and Victory mechanical Services, Inc. (corporate representatives) on June 9, 2015 (Exhibit A);
2. Ameridose, LLC (corporate representative) on June 11, 2015 at 9am (Exhibit B).
3. GDC Properties, LLC (corporate representative) on June 12, 2015 (Exhibit C).
4. Unifirst Corporation (corporate representative) on June 18, 2015 at 9am (Exhibit D).
5. Edwin Cardona, Contamination Control Manager on June 18, 2015 at 1pm (Exhibit E).

The notices were separately e-mailed and/or mailed to (1) the deponents or their counsel and (2) directly involved counsel. The depositions are being taken pursuant to the deposition protocol previously entered by the Court (Exhibit F). This notice is filed in the main docket to ensure that all parties have notice.

¹ Saint Thomas West Hospital f/k/a St. Thomas Hospital; Saint Thomas Health; and Saint Thomas Network.

Dated: April 30, 2015

By their attorneys,

/s/ Sarah P. Kelly
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*Appearing Pro Hac Vice

CERTIFICATE OF SERVICE

I certify that this document filed through the CM/ECF system will be served electronically to the registered participants identified on the Notice of Electronic Filing this 30th day of April, 2015.

/s/ Sarah Kelly

Sarah P. Kelly